



UK Government

Energy NPS Update 2025

Appraisal of Sustainability – Post Adoption
Statement

October 2025



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Contents

1. Introduction	4
Purpose of this Post Adoption Statement	5
2. How sustainability considerations have been integrated into the updated Energy NPS	8
3. How the AoS Report was taken into account in developing the updated NPS	11
Stage A: Scoping	11
Stage B: Development and refining options and assessing effects	20
Stage C: Preparing the AoS Report & Stage D: Consulting	20
Stage E: Monitoring	21
4. How consultation responses have been taken into account	22
5. The reasons for choosing the NPS as adopted, in light of other reasonable alternatives considered	24
6. Measures to monitor significant effects	26
Appendix A: Consultation comments and how these have been addressed	36

1. Introduction

This document is the Post Adoption Statement of the Appraisal of Sustainability (AoS) for the updated Energy National Policy Statements (NPS).

The Energy NPS has been set out in the following series:

- EN-1: Overarching NPS
- EN-2: Natural Gas Electricity Generation
- EN-3: Renewable electricity generation (both onshore and offshore)
- EN-4: Gas supply infrastructure and gas and oil pipelines
- EN-5: The electricity transmission and distribution network
- EN-6: Nuclear generation

The current versions of EN-1 to EN-5 were adopted in 2024 after undergoing a process of revision. The exception being nuclear generation (EN-6) which remains as designated by the Department of Energy and Climate in 2011. EN-6 only has effect in relation to nuclear electricity generation deployable by the end of 2025 but continues to provide information that may be important and relevant for projects which will deploy after 2025. A new NPS (EN-7) for new Nuclear generation is being developed in a separate process and once designated, will sit alongside the other elements of the Energy NPS.

EN-1 to EN-5 were reviewed to ensure they reflected changes in energy policy direction, with resulting material changes made to EN-1, EN-3 and EN-5. The material changes were set out in the consultation document 'Revised draft National Policy Statements for energy infrastructure' which was issued for consultation in April 2025. It was the purpose of the AoS to consider the implications that the updates may have had within the overall assessments of EN-1, EN-3 and EN-5 as undertaken for the 2024 adopted EN-1 to EN-5, alongside changes made to the AoS framework to reflect changes in policy direction and/or new policy introduced since the last scoping exercise was undertaken and updates to understanding of baseline conditions and any new sustainability issues. This is set out in the AoS Report published alongside the updated EN-1, EN-3 and EN-5.

The assessments of EN-2 and EN-4 were not revisited. Note, that whilst no revisions to EN-2 and EN-4 were made as part of the review and update process, it was also considered that the changes to the AoS framework did not merit reopening the assessments for the particular technologies set out with EN-2 and EN-4, and as such the reader should refer to National Policy Statement for energy – Appraisal of Sustainability (January 2024)¹ for full assessment details.

¹ [National Policy Statements for energy infrastructure - GOV.UK](#)

Purpose of this Post Adoption Statement

Part 4 of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) requires that information on the NPS, as well as how the SEA has been taken into account, should be published on adoption. Note that while the SEA Regulations focus on environmental effects, AoS covers a wider remit, with an additional focus on social and economic effects alongside environmental ones. This statement covers the three types of effects.

The purpose of the Post Adoption Statement is thus to describe:

- How sustainability considerations (including environmental) have been integrated into the NPS;
- How the AoS Report has been taken into account in preparation of the NPS;
- How the opinions expressed in the consultation on Scoping Report and the AoS Report have been taken into account;
- The reasons for choosing the NPS as adopted, in the light of other reasonable alternatives considered;
- The measures that are to be taken to monitor the significant sustainability effects (including significant environmental effects) of the implementation of the NPS.

This Post Adoption Statement is the last of a series of formal documents that have been produced as part of the AoS process of the Energy NPS Update, the first being the Scoping Report (February 2025) that set out the scope of the assessment and documents how the initial AoS Framework is identified. The second document was the AoS Report (published for public consultation in April 2025). A final AoS Report has been produced and has been published alongside the NPS.

In addition, another separate document informed the preparation of the AoS Report: a Habitats Regulations Assessment (HRA) Report was also published alongside the AoS and NPS. The HRA Report was prepared for the draft Energy NPS Update in a parallel process to the AoS and was the subject of public consultation alongside the draft NPS and the AoS Report in April 2025.

In England and Wales, under the Conservation of Habitats and Species Regulations 2017 (as amended), as well as the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) (together known as the 'Habitats Regulations'), an 'Appropriate Assessment' is required to be undertaken on proposed plans or projects which are not necessary for the management of a habitat site but which are likely to have a significant effect on one or more habitat sites either individually, or in combination with other plans or projects.

It is important to note that the Habitats Regulations require assessment of the NPS as a plan and as such the HRA Report has been undertaken on that basis – this does not remove the requirement for detailed project level HRAs to be undertaken at development consent stage. There are no specific sites, allocations or any spatial component to the NPSs; therefore, the

HRA Report has purely focused on the policy content within each NPS and has been applied to updated drafts of EN-1, EN-3 and EN-5 in a manner which is consistent with their non-spatial, strategic nature.

This Post Adoption Statement should be read in conjunction with the NPS and AoS Report and details the following:

Table 1.1 – How the Post Adoption Statement meets legislative requirements

Purpose of the Post Adoption Statement	Where is this demonstrated in the Post Adoption Statement?
How environmental considerations have been integrated into the NPS	Section 2 sets out how environmental considerations were taken into account and notes that the cornerstone of doing this was through a comprehensive AoS Framework and its application through the assessment process.
How the AoS Report has been taken into account in preparation of the NPS	Section 3 notes how the AoS Report was taken into account. This section provides detail on key recommendations made through the AoS process.
How the opinions expressed in consultation have been taken into account	Section 4 notes that consultation took place in respect of the Scoping Report and of the AoS Report. Detail is provided in Appendix A to this Post Adoption Statement as to how these responses were addressed.
The reasons for choosing the NPS as adopted, in light of other reasonable alternatives considered	Section 5 sets out how consideration was made in the AoS in respect of a range of Alternatives to each NPS and notes that to maintain the AoS at a level proportionate to the level of detail within the NPS, the strategic alternatives were assessed at a higher level than the AoS Framework by using six sustainable development themes, identified through aggregating the AoS objectives into topics that better reflected the strategic characteristics of the options. Alternatives were considered relative to the preferred Alternative Plan, which was also assessed at a greater level of detail against the AoS Framework. Overall, it was shown that none of the alternatives presented were as good as, or better than, the proposals set out in the updated and adopted NPS.
The measures that are to be taken to monitor the significant environmental effects of the implementation of the NPS	Measures to monitor significant effects are set out in Section 6. It is the intention that monitoring will focus upon significant effects that may give rise to irreversible damage, with a view to identifying trends before such damage is caused, and also significant effects where there was uncertainty in the AoS and where monitoring

	would enable preventative or mitigation measures to be undertaken.
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2. How sustainability considerations have been integrated into the updated Energy NPS

The current suite of energy National Policy Statements (NPSs) were published by the Department for Energy Security and Net Zero (DESNZ) in January 2024. In July 2024, the government launched a review of the energy NPSs to ensure they reflected government's energy priorities as set out in the Clean Power 2030 Action Plan. A review of the NPSs has been completed and EN-1, EN-3 and EN-5 have been updated, with an AoS undertaken to consider effects on sustainability of the amendments made.

As previously, the overarching updated EN-1 recognises that to produce the energy required for the UK and ensure it can be transported to where it is needed, a significant amount of infrastructure is needed at both local and national scale. High quality infrastructure is crucial for economic growth, boosting productivity and competitiveness, while also meeting decarbonisation targets. This type of infrastructure is, by its nature, typically large scale, with significant 'footprint', material and resource requirements to build and operate, along with significant construction, operation and decommissioning activities.

Recognition and addressing of these issues form a key part of the NPSs and the updated planning framework set out in EN-1 takes full account of the objective of contributing to the achievement of sustainable development. The National Planning Policy Framework (NPPF), the Planning Practice Guidance (PPG) for England, and Planning Policy Wales and Technical Advice Notes (TANs) for Wales, as well as a range of other guidance documents, are also taken into account, where appropriate. As such, updated EN-1 aims to ensure that the development of new energy infrastructure projects is consistent with the objectives for sustainable development, including consideration of other Government policies such as those for the environment, economic development, health and transport.

The approach to development of new energy infrastructure set out in updated EN-1 is built around a series of general policies and technical guidance, within which environmental and wider sustainability considerations form a key component. Among the considerations set out are those relating to general environmental effects, health, marine, biodiversity net gain, climate change adaptation and resilience, pollution control and other environmental regulatory regimes. More details on anticipated generic environmental impacts are then set out to cover the following topics:

- Air quality and emissions
- Greenhouse gas emissions
- Biodiversity and geological conservation
- Coastal change

- Dust, odour, artificial light, smoke steam and insect infestation
- Flood risk
- Historic environment
- Land use (including specific reference to certain designations)
- Noise and vibration
- Traffic and transport
- Resource and waste management
- Water quality and resources

While the above list is comprehensive in terms of generic environmental impacts applying to all infrastructure, updated EN-1 also recognises that there may be specific issues relevant to certain technologies, or which warranted additional consideration due to the nature of different technologies.

Therefore, in addition to generic and overarching issues set out in updated EN-1, specific sustainability considerations pertinent to particular technologies are specified in EN-2 to EN-5. Note that only EN-3 and EN-5 were updated as part of this review – EN-2 and EN-4 remain as published in January 2024.

Of important note within updated EN-1 is that there is a requirement for all energy infrastructure proposals that are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) to be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project.

The EIA Regulations specifically refer to effects on population, human health, biodiversity, land, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them.

The EIA Regulations also require an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects.

It is also the case that the NPS requires consideration of the potential environmental effects of a proposed project to be made even in those cases where the EIA Regulations do not apply and an ES is not required. In these circumstances, the applicant should instead provide information proportionate to the scale of the project on the likely significant environmental, social, and economic effects.

Therefore, it can be concluded that environmental considerations have been included in the NPS in a comprehensive and robust fashion from the very earliest stages of NPS development, as well as through the latest updates to EN-1, EN-3 and EN-5. The AoS process

ensured that all relevant aspects were considered, tested and added as necessary to ensure the framework for the development of new nationally significant energy infrastructure projects remained up to date and was consistent with objectives for sustainable development. How this was taken into account during the development of the NPS is set out next.

While the lack of spatial information within the NPS made it impossible to reach certainty on the effect of the plan on the integrity of any habitat site, the potential for proposed energy infrastructure projects of the kind contemplated by EN-1 to EN-5 to have adverse effects on the integrity of such sites cannot be ruled out, based on the precautionary principle. The HRA explains why the Government considers that EN-1 to EN-5 are, nevertheless, justified by imperative reasons of overriding public interest, while noting that its conclusions are only applicable at the NPS level and are without prejudice to any project-level HRA, which may result in the refusal of consent for a particular application.

3. How the AoS Report was taken into account in developing the updated NPS

The AoS process commenced at the beginning of the update to the Energy NPSs and continued in an iterative process, with close liaison maintained between the NPS update team and the AoS team. As set out in SEA Guidance², a staged approach was undertaken.

Stage A: Scoping

As the Energy NPSs were being updated (focused on EN-1, EN-3 and EN-5), it was considered that the approach to and scope of the AoS of the updated NPSs also needed to be updated and confirmed, in order to ensure that it remained robust and consistent with the latest approaches to sustainable development. Therefore, the following tasks were undertaken:

- A review of recent policies, plans and programmes relevant to the NPSs was undertaken to ensure that latest approaches to sustainable development were understood and reflected in the AoS framework.
- A review of recent baseline data relevant to England and Wales was undertaken to ensure that any changes to the environmental and social context of the NPSs was understood and reflected in the AoS framework.

Key sustainability issues were confirmed through analysis of the updated baseline data and review of recent plans and programmes. The identification of these issues helped focus the AoS processes on the aspects that really mattered. Implications to NPS updates and opportunities for how the updated NPSs could assist in addressing these issues were also identified.

A set of updated AoS Objectives was developed, against which the policies in the updated NPSs could be assessed, specifically in this case for EN-1, EN-3 and EN-5. For each objective, guide questions were updated, and in some cases new ones set out, to form the AoS framework which was a fundamental component of the AoS and was used as a mechanism to consistently test the environmental and wider sustainability performance of the updated NPSs with all appropriate issues addressed. Note that the updated AoS framework used was an iteration of that developed for the previous 2024 AoS of Energy NPSs reflecting recent changes to baseline data and a review of the latest legislation, plans and policies as well as changes in approaches to sustainability and energy policy. This ensured the robustness and consistency of the updated AoS framework which was subsequently applied during the assessment of the updated NPSs.

Key elements of change related to the need to reflect the change in policy direction as set out in the updated NPS consultation document. These included the Clean Power 2030 Action

² A practical guide to the Strategic Environmental Assessment Directive

Plan, which accelerates the delivery of renewable and low carbon power, reintroducing onshore wind into the National Significant Infrastructure Project (NSIP) regime, endorsement of the Centralised Strategic Network Plan, reference to the Electricity Transmission Design Principles, and updated guidance for wake effects for offshore wind projects. The framework was also updated to better reflect principles such as avoiding environmental harm, being precautionary and embedding environmental protection, which are a cornerstone of the Environment Act 2021.

In addition, some objectives or guide questions were amended to provide greater or more succinct clarity on certain aspects, for example to better reflect the multiple receptors in respect of climate change. The updated framework was also influenced by recent AoS undertaken in respect of nuclear generation (proposed EN-7) which examined an up-to-date baseline and recent plans and policies.

It is important to note that the updated AoS framework was only applied to those elements of the NPSs that were updated as part of the review process undertaken i.e. EN-1, EN-3 and EN-5.

The scoping information was refined through consultation on the AoS Scoping Report with the statutory consultees identified under the SEA Regulations (including those of England, Wales, Northern Ireland and Scotland). This consultation took place from February to March 2025. The scoping consultation comments were communicated to the NPS update team and taken on board in preparing the AoS Report (see Appendix B to the AoS Report).

The updated AoS framework used in assessment of the updated NPS is as follows:

Table 2.1 – Updated AoS Framework used to assess updated Energy NPSs (EN-1, EN-3 and EN-5)

No.	AoS Objective	Guide Questions
1	Consistent with the national target of reducing carbon emissions to Net Zero by 2050	Will the updated NPS... • Support reduction of the carbon emissions of the national portfolio of major energy infrastructure? • Support reduction of direct and indirect emissions of all greenhouse gases, including carbon dioxide, during construction, operation and decommissioning? • Support supply of energy from low carbon/renewable energy sources / use of low carbon/renewable energy? • Support use carbon removals to offset residual emissions from energy such Negative Emissions Technologies (NET) and Nature Based Solutions (NBS)? • Support creation of new carbon sinks/removals through natural sequestration including that by natural habitats, blue-green infrastructure and soils? • Support an energy system consistent with reducing carbon emissions to Net Zero by 2050 and long term emphasis on electrification of Clean Power 2030?
2	Maximise adaptation and resilience of built assets, communities and people as well as natural assets, habitats and species, to the multiple effects of climate change *	Will the updated NPS... • Promote future proofing against the effects and risks of climate change (e.g. flooding, sea level rise, coastal erosion and change in weather patterns)? • Encourage design for successful adaptation to the predicted changes in weather conditions and frequency of extreme weather events (freezing, heat waves, intense storms)? • Address the climate induced risks of cascading failures from interdependent infrastructure energy networks?

Energy NPS Update 2025 AoS Post Adoption Statement

No.	AoS Objective	Guide Questions
	*Adaptation is about taking steps to live with the effects and managing the impact of climate change such as building quay walls and flood barriers or managing coasts through rollback. Resilience is the ability of a system to adsorb and bounce back after an adverse event.	• Lead to major infrastructure development that is flood resilient over its lifetime, considering the effects of climate change, without increasing the flood risk elsewhere and identifying opportunities to reduce the risk overall? • Avoid inappropriate development in areas at risk from flooding and coastal erosion? • Manage the risks of flooding and coastal erosion, particularly through working with natural processes? • Ensure provision of appropriate compensatory measures is in place when there is no other option to land take from areas of flood plain?
3	Enhance biodiversity and ecological networks, deliver biodiversity net gain, protect and support ecosystem resilience and functionality	Will the updated NPS... • Protect and enhance nationally designated sites such as SSSIs and National Nature Reserves, Marine Conservation Zones, Marine Protection Areas and Highly Protected Marine Areas, including those of potential or candidate designation? • Protect and enhance valued habitat and populations of protected/scarce species on locally designated sites, including Key Wildlife Sites, Local Wildlife Sites and Local Nature Reserves? • Protect the structure and function/ecosystem processes, including in the marine environment? • Protect and enhance the Nature Recovery Network? • Protect and enhance priority habitats and irreplaceable habitats, and the habitat of priority species? • Promote new habitat creation or restoration and linkages with existing habitats?

Energy NPS Update 2025 AoS Post Adoption Statement

No.	AoS Objective	Guide Questions
		• Protect and enhance the wider green and blue infrastructure network? • Increase the resilience of biodiversity to the potential effects of climate change? • Reduce or avoid impacts to habitats with important roles in carbon sequestration? • Encourage sensitive or nature inclusive design in terrestrial and marine environments? • Ensure energy activities protect fish stocks and marine mammals? • Ensure energy activities do not exacerbate disturbance to bird populations? • Deliver a minimum 10% net gain in biodiversity for any new major infrastructure development? • Increase the resilience of biodiversity to the potential effects of climate change? • Prevent spread of invasive species (native and non-native), including new invasive species because of climate change?
4	Protect and enhance sites designated for their international importance for nature conservation purposes <i>(linked to separate HRA process for Energy NPS)</i>	Will the updated NPS... • Avoid the direct loss of, or indirect harm to, 'Habitats Sites' (SPAs, SACs and Ramsar sites), including those of potential designation (candidate SPAs, proposed SACs, Sites of Community Importance (SCI) and proposed Ramsar sites) and compensation sites both onshore and offshore? • Support continued improvements to the condition status of the UK's national site network?
5	Protect and enhance cultural heritage assets and their settings, and the wider historic environment	Will the updated NPS... • Conserve and enhance designated heritage assets and their settings (World Heritage Sites, Scheduled Monuments, Listed Buildings and structures, Registered Parks and Gardens, Registered Battlefields and Conservation Areas), as well as maritime assets such as protected wrecks?

Energy NPS Update 2025 AoS Post Adoption Statement

No.	AoS Objective	Guide Questions
		• Conserve and enhance non-designated and / or locally listed heritage assets (including newly discovered heritage assets and archaeology) and their settings? • Address heritage assets at risk, or protect them from further threats? • Avoid significant harm to heritage assets, for example from the generation of noise, pollutants and visual intrusion? • Ensure appropriate archaeological assessment prior to development? • Maintain or improve the interpretation, understanding and appreciation of the historic environment? • Increase public access to heritage assets?
6	Protect and enhance the character and quality of the landscapes, townscapes and waterscapes and protect and enhance visual amenity	Will the updated NPS... • Avoid the development in National Parks and National Landscapes (formerly AONBs)? • Support the integrity of any areas designated for landscape value, including in conjunction with the provisions of any relevant Management Plan (e.g. National Parks, National Landscapes, Heritage Coasts and local landscape designations)? • Conserve and enhance the intrinsic character or setting of local landscapes or townscapes or waterscapes? • Minimise noise and light pollution from construction and operational activities on residential amenity and on sensitive locations, receptors and views? • Prevent reduced tranquility / preserve tranquility? • Conserve, protect and enhance natural environmental assets (e.g. parks and green spaces, common land, woodland / forests etc) where they contribute to landscape and townscape quality?

Energy NPS Update 2025 AoS Post Adoption Statement

No.	AoS Objective	Guide Questions
7	Protect and enhance the water environment	Will the updated NPS... • Protect ground, surface, estuarine and coastal water quality in line with Water Framework Directive and Marine Strategy Framework requirements? • Result in changes to groundwater distribution and flow? • Safeguard the availability of water resources (surface and groundwater)? • Minimise the use of water resources / water consumption? • Protect the integrity of coastal and estuarine processes? • Reduce operational and accidental discharges to the water environment? • Protect the quality of the seabed and its sediments, and avoid significant effects on seabed morphology and sediment transport processes?
8	Protect and enhance air quality on a local, regional, national and international scale	Will the updated NPS... • Minimise emissions of dust and other air pollutants that affect human health or biodiversity? • Improve air quality within AQMAs and avoid the need for new AQMAs? • Promote enhancements to green infrastructure networks to help improve air quality?
9	Protect soil resources, promote use of brownfield land and avoid land contamination	Will the updated NPS... • Assist in facilitating the re-use of previously developed land? • Avoid development upon the best and most versatile agricultural land? • Ensure the protection of soil resources and avoid soil health degradation through sustainable soil management and re-use? • Seek to remediate contaminated land?

Energy NPS Update 2025 AoS Post Adoption Statement

No.	AoS Objective	Guide Questions
		Minimise development (hardstanding) footprint to reduce soil sealing?
10	Protect, enhance and promote geodiversity	Will the updated NPS... - Protect and enhance geodiversity resource? - Protect or enhance SSSIs designated for their geological interest? - Avoid the degradation and removal, wherever possible, of RIGS? - Protect geodiversity on the shoreline and marine waters? - Support access to, interpretation and understanding of geodiversity?
11	Improve health and well-being and safety for all citizens and reduce inequalities in health	Will the updated NPS... - Protect the health of communities through prevention of accidental pollutant discharges, exposure to electric and magnetic fields, shadow flicker or radiation? - Minimise nuisance on communities and their facilities including, noise, artificial light, odour, dust, steam, smoke and infestation of insects? - Result in loss of recreational and amenity land or loss of access? - Provide for facilities that can promote more social interaction and a more active lifestyle and enjoyment of the countryside and coasts? - Promote initiatives that enhance safety and personal security for all?
12	Promote sustainable transport and minimise detrimental impacts on strategic transport network and disruption to basic services and infrastructure	Will the updated NPS... - Prevent adverse changes to strategic transport infrastructure road/rail/airport? - Prevent loss or disruption to basic services and infrastructure (e.g. telecommunications, electricity, gas)? - Promote transportation of goods and people by low/zero carbon transport modes?

Energy NPS Update 2025 AoS Post Adoption Statement

No.	AoS Objective	Guide Questions
		• Reduce travel distances to work and reduce the need for out commuting? • Facilitate working from home, remote working and home-based businesses?
13	Promote a strong economy with opportunities for local communities	Will the updated NPS ... • Support enhanced security, reliability and affordability of the national energy supply? • Support creation of both temporary and permanent jobs and increase skills, particularly in areas of need? • Have wider socio-economic effects such as changes to the demographics, community services or house prices? • Delivery of infrastructure to support economic investment in the local economy?
14	Promote sustainable use of resources and natural assets	Will the updated NPS... • Reduce consumption of materials, energy and resources? • Promote sustainable waste management practices in line with the waste hierarchy? • Encourage the use of recycled and / or secondary materials? • Encourage the development of a circular economy? • Promote the use of low carbon materials and technologies? • Produce waste by-products that require appropriate management? • Promote the use of local suppliers that use sustainably-sourced and locally produced materials?

Stage B: Development and refining options and assessing effects

Assessment was made of each of the components of the updated overarching EN-1 first against each of the AoS Objectives and associated guide questions. Then the assessment of technology specific EN-3 and EN-5 was undertaken nested within this overarching assessment and focused on selected AoS Objectives most impacted by the type of technology.

Inter-relationships between topics and likely significant secondary, synergistic and cumulative effects were also reported where appropriate in each topic. Where significant adverse effects were predicted, possibilities for mitigation were suggested.

A series of recommendations were made to the NPS development team in respect of how the NPS could be strengthened in sustainability terms. Such recommendations for clarifying and strengthening of the NPSs were also discussed within Government.

In addition to the NPSs being amended to reflect recommendations made by the AoS, there were also changes to the provisions of the NPS, as a result of public consultation and ESNZ Committee scrutiny, which were considered as required by the AoS.

Stage C: Preparing the AoS Report & Stage D: Consulting

The updated AoS Report described the process undertaken in carrying out the AoS of the updated NPS. The document sets out the findings of the appraisals, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium, and long-term and permanent and temporary effects), making recommendations for improvements and clarifications that may help to mitigate negative effects and maximise the benefits of the updated NPS, and outlining proposed monitoring measures.

The updated AoS Report detailing the outcomes of the Stage A, B and C tasks was published alongside the Draft updated NPSs that were subject to public consultation from 24th April to 29th May 2025. Scrutiny by the ESNZ Committee took place from 23rd April to 23rd June and a debate was also held within the House of Lords Grand Committee on the updated NPS on 9th July 2025.

A series of consultation responses from a range of organisations and members of the public were received to consultation on the updated NPSs and the associated AoS Report. How these responses were considered and taken into account is outlined below in Section 4.

Stage E: Monitoring

Stage E will follow the adoption of the updated NPS. Chapter 10 of the AoS Report contains Monitoring that will help to examine the effects predicted through the AoS process against the actual effects of the NPSs when they are implemented. It is also a requirement of the SEA Regulations to describe the measures envisaged concerning how significant effects of implementing the NPSs will be monitored – Regulation 17(1) notes “the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”. As Office of the Deputy Prime Minister (ODPM) Guidance³ advises, it is not necessary to monitor everything, or monitor an effect indefinitely, but rather monitoring needs to be focused on significant sustainability effects. Monitoring should therefore focus upon significant effects that may give rise to irreversible damage, with a view to identifying trends before such damage is caused, and significant effects where there was uncertainty in the AoS and where monitoring would enable preventative or mitigation measures to be undertaken.

Further detail is provided on Monitoring in Section 6 below.

³ ‘A practical guide to the Strategic Environmental Assessment Directive’, ODPM, 2005 See: [Strategic Environmental Assessment Directive: guidance - GOV.UK](#)

4. How consultation responses have been taken into account

Prior to consideration of the amendments to the NPS, an updated and revised AoS Framework was set out in a Scoping Report, which was consulted upon February to March 2025 with the statutory consultees identified under the SEA Regulations (including those of England, Wales, Northern Ireland and Scotland). The consultation process resulted in a range of comments which are set out (along with how these were addressed) in Appendix B to the AoS Report and are not repeated here.

Initial proposed material changes to the NPS were set out in a consultation document 'Revised draft National Policy Statements for Energy Infrastructure', which was issued for consultation in April 2025. A series of comments were received from the public consultation to the draft updated NPSs, both in relation to the NPSs themselves and the AoS Report. How the comments specifically relating to the AoS were addressed is set out in Appendix A to this Post Adoption Statement.

The comments made in respect of the NPSs have resulted in a number of amendments to the updated NPSs. Many of these amendments are considered minor and related to providing additional context to elements of the NPSs, or clarification on roles and responsibilities of particular organisations, or related to amendments to text to ensure better clarity of intention and to aid understanding. As such, it was considered that such amendments did not have any adverse implications for sustainability or actually strengthened sustainability performance of the NPSs as they made it clearer as to what would be expected in terms of energy infrastructure development.

One example of additional clarity provided, is set out in updated EN-3 which now notes that 'any reference to offshore transmission infrastructure within this NPS includes electricity transmission connections between offshore electricity generation projects and the onshore transmission system'. EN-3 was also updated to provide additional clarification on the role of the MMO in respect of applying the Marine and Coastal Access Act 2009 (MCAA).

Another example of such amendments, which were not of direct relevance to the AoS but which enhance clarity of the NPSs, includes additional text relating to communications, navigation and surveillance (CNS) infrastructure which it is now noted includes assets that facilitate radio communications, navigational and landing systems, and radars such as those used to facilitate air defence and air traffic management (often referred to as 'technical sites'). It is also now stated that consideration of development near CNS infrastructure should take into account statutory technical safeguarding zones defined in accordance with Planning Circular 01/03, or any successor, and the potential for energy development, and/or its supporting infrastructure, to produce electro-magnetic and electrical noise interference which may degrade the capability or operation of defence CNS infrastructure.

The consultation process also resulted in a small number of amendments to the NPSs which were considered of more direct relevance to the AoS and consideration was given to these, along with further discussions with the NPS development team as to their rationale.

Some elements were introduced as these strengthened the sustainability performance of the updated NPSs, or provided clearer cross-referencing. For example, following a recommendation from the Environment Agency, additional text was added that clarifies that under the principle of sustainable development energy infrastructure can only be deployed in areas with local environmental capacity to enable those developments. Similarly, the NPSs were strengthened by additional text that recognises that energy from waste (EfW) proposals must meet statutory waste reduction targets and not compete with waste prevention, reuse or recycling. It is also clarified that this type of infrastructure (EfW) is not subject to CNP and is not critical to Clean Power 2030.

Other examples of additional text that has strengthened and clarified the NPSs includes the added clarity that in addition to solar farms, onshore wind projects also need to be aligned with the requirements of the Environmental Improvement Plan and the Environment Act 2021. Similarly, additional text has been added that clarifies the latest status of National Parks, the Broads and National Landscapes.

Small areas of technical errors were also amended – for example, the NPS noted a date of 2025 for commercial scale blending of gas to start, but this has been revised to note it is not expected before 2026-2027.

Further discussion with the NPS development team centred on the issue of Biodiversity Net Gain (BNG). It has been clarified that BNG is not currently a legal requirement for NSIPs and therefore this cannot be stated in the NPS. However, enhancement of biodiversity is something which developers should consider as set out in EN-1 Section 4.6. Separate guidance, provided by Defra, exists on how developers should approach compensation and what is considered appropriate in terms of ‘like for like’ vs measures targeted at wider ecosystem enhancements.

A number of recommendations were also made by Natural England in respect of the monitoring plan. This has resulted in amendments to that proposed in the AoS, with the new monitoring programme set out below.

5. The reasons for choosing the NPS as adopted, in light of other reasonable alternatives considered

The NPSs set a strategic framework within which it is for industry to propose new energy infrastructure projects. The reasonable alternatives that have been formulated to inform the development of EN-1, EN-3 and EN-5 (and of their updates) were based on the fundamental premise that a combination of technologies, not one single technology, will be required to deliver secure and affordable supplies of energy which are compatible with net zero and protect the environment.

Alternatives were assessed under the broad themes of Climate Change (Net Zero), Security of Energy Supply, Health and Well-being, the Economy, the Built Environment and the Natural Environment.

It was considered that such an approach remained valid for considering alternatives to the updated EN-1 and after reconsideration of each alternative it was concluded that these remain appropriate in the context of the material changes made to updated EN-1.

In respect of EN-1, the following alternatives were considered:

Table 5.1 – Alternatives considered in respect of EN-1

	Description
EN-1	Updated EN-1 combines Renewables (including Solar, Onshore and Offshore Wind, Biomass and Energy from Waste with CCS), Natural Gas-fired electricity generation with or without CCS, Hydrogen-fired electricity generation, Pumped Hydro Storage, Nuclear, associated electricity network infrastructure, and natural gas, oil, hydrogen and CCS infrastructure.
Alternative 1 (A1)	As updated EN-1 without Nuclear and Unabated Natural Gas.
Alternative 2 (A2)	As updated EN-1 without Unabated Natural Gas.
Alternative 3 (A3)	As updated EN-1 without Nuclear.

The assessment concluded that none of these alternatives are as good as, or better than, the proposals set out in updated EN-1 and therefore the government’s preferred option is to take forward updated EN-1. Note that the Clean Power 2030 Action Plan states that the impact of reaching Clean Power by 2030 will help to shield consumers from international energy price spikes by reducing reliance on fossil fuels, and accelerating deployment of renewables, nuclear, hydrogen, CCUS, and related network infrastructure and updated EN-1, EN-3 and EN-5 are now set out to reflect these wider requirements by introducing greater flexibility in energy infrastructure provision at the national level.

In respect of EN-3, the alternatives considered were:

- EN-3 (a): only consent Biomass/EfW plant with Combined Capture and Storage (CCS)
- EN-3 (b): not consent Onshore Wind

The assessment showed that only consenting biomass / EfW plants with CCS would lead to uncertainty, for example in relation to waste and the extent to which biomass is more cost effective in decarbonising other sectors over the long term. The assessment also showed that the inclusion of onshore wind in updated EN-3 was the preferred approach as it will help decarbonise the electricity system quicker and achieve net zero targets, diversify the energy mix with less reliance on fossil fuels hence enhancing security of supply and through being one of the cheapest forms of renewable energy generation will contribute to lowering electricity costs and energy bills.

In respect of EN-5, the alternative (to EN-5) was the following:

- EN-5 (a): adopt a blanket presumption that all electricity lines should be put underground

The assessment concluded that given that underground lines are not without a range of adverse impacts of their own, and that they are significantly more expensive, it is considered better to adopt the policies set out in the updated EN-1 and updated EN-5 and not to prefer presumption in favour of undergrounding for all electricity lines. This is because the range of factors to be taken into account means that any decision to underground is best taken within a more flexible policy framework that follows a case-by-case evaluation of all of the impacts of a particular project and supports the use of both undergrounding and overhead lines as appropriate, in line with the appraisal findings.

As such, overall, the updated assessments continued to show that none of the alternatives considered were as good as, or better than, the proposals set out in the updated NPSs and therefore the government's preferred option was to take forward the updated Energy NPS EN-1 (and the updated technology-specific NPSs EN-5 and EN-5).

6. Measures to monitor significant effects

Monitoring helps to examine the effects predicted through the AoS process against the actual effects of the NPSs when they are implemented. It is also a requirement of the SEA Regulations to describe the measures envisaged concerning how significant effects of implementing the NPSs will be monitored – Regulation 17(1) notes “*the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action*”. It is not necessary to monitor everything, or monitor an effect indefinitely, but rather monitoring needs to be focused on significant sustainability effects. Monitoring should therefore focus upon significant effects that may give rise to irreversible damage, with a view to identifying trends before such damage is caused, and significant effects where there was uncertainty in the AoS and where monitoring would enable preventative or mitigation measures to be undertaken.

While significant effects have not been identified in relation to all Objectives and it is considered that in many instances the updated NPSs provide robust policy to address issues, the non-specific spatial nature of the updated NPSs does mean that there is, in some instances, a degree of uncertainty in findings and as such a potential for unforeseen individual or cumulative effects to arise. Therefore, it was considered important to take a precautionary approach to monitoring. On this basis, a monitoring programme was set out and is detailed in Chapter 9 of the AoS Report, to which reference should be made to for further detail as to the rationale for the monitoring. Note that following consultation, some amendments were made to this programme, in respect of ‘responsibility’. The following table sets out the final monitoring programme.

Table 6.1 – Monitoring

AoS Objective	Monitoring measure / indicator	Target	Data Source	Suggested frequency	Responsibility
Objective 1: Consistent with the national target of reducing carbon emissions to Net Zero by 2050	CO2 and other GHG emissions such as SF6 from energy sector (by source)	Reduce to pathway consistent with Net Zero targets	DESNZ: UK greenhouse gas emissions national statistics	Annual	DESNZ
	% output from low carbon sources	To be consistent with Net Zero target	DESNZ: Digest of UK Energy Statistics (DUKES)	Annual	DESNZ
	Electricity generation by technology	To be consistent with Net Zero target	DESNZ: Digest of UK Energy Statistics (DUKES)	Annual	DESNZ
Objective 2: Maximise adaptation and resilience of built assets, communities and people as well as natural assets, habitats and species, to the multiple effects of climate change *	Area of flood risk (from all sources) constructed upon by new Energy Schemes	Zero	Environment Agency, Local Authorities and Energy Scheme developers (in respect of individual projects)	Annual	Energy Scheme developers (in respect of individual projects) – reporting to DESNZ
	Number of new Energy Schemes designed for	All	Environment Agency, Local Authorities and Energy Scheme	Annual	Energy Scheme developers (in respect of individual

*Adaptation is about taking steps to live with

Energy NPS Update 2025 AoS Post Adoption Statement

AoS Objective	Monitoring measure / indicator	Target	Data Source	Suggested frequency	Responsibility
the effects and managing the impact of climate change such as building quay walls and flood barriers or managing coasts through rollback. Resilience is the ability of a system to adsorb and bounce back after an adverse event.	successful adaptation to climate change		developers (in respect of individual projects)		projects) – reporting to DESNZ
	Number of new Energy Schemes designed to include best practice SuDS (where appropriate) and / or upstream Natural Flood Management	Increase	Environment Agency, Local Authorities and Energy Scheme developers (in respect of individual projects)	Annual	Energy Scheme developers (in respect of individual projects) – reporting to DESNZ
Objective 3: Enhance biodiversity and ecological networks, deliver biodiversity net gain, protect and support ecosystem resilience and functionality	Net Gain in Biodiversity (using the DEFRA metric) due to energy schemes	Increase in Biodiversity Net Gain	Energy Scheme developers (in respect of individual projects)	Annual	Energy Scheme developers (in respect of individual projects) – reporting to DESNZ
	Changes in areas of biodiversity importance (priority habitats and species by type) and areas designated for their intrinsic environmental value including sites of	Year on year increase in area (ha)	Natural England, Joint Nature Conservation Committee, Local Authorities and Energy Scheme developers (in respect of	Annual (subject to data availability)	Natural England, Joint Nature Conservation Committee, Local Authorities and Energy Scheme developers (in respect of

Energy NPS Update 2025 AoS Post Adoption Statement

AoS Objective	Monitoring measure / indicator	Target	Data Source	Suggested frequency	Responsibility
	national, regional or sub regional significance		individual projects)		individual projects)
	Area of Green Infrastructure	Year on year increase in area (ha)	Local Authorities and Energy Scheme developers (in respect of individual projects)	Annual	Local Authorities and Energy Scheme developers (in respect of individual projects)
Objective 4: Protect and enhance sites designated for their international importance for nature conservation purposes	Condition of international and or habitat sites	Year on year increase in improvement	Natural England, Joint Nature Conservation Committee, Local Authorities and Energy Scheme developers (in respect of individual projects)	Annual (subject to data availability)	Natural England, Joint Nature Conservation Committee, Local Authorities and Energy Scheme developers (in respect of individual projects)
Objective 5: Protect and enhance cultural heritage assets and their settings, and the wider historic environment	Change to heritage assets and their settings compared to a baseline assessment	Reduction in direct impacts from energy infrastructure as it is developed.	Historic England, Local Authorities and Energy Scheme developers (in respect of individual projects)	Annual	DESNZ
	Number of heritage assets that are placed on or removed from the Heritage at Risk				

Energy NPS Update 2025 AoS Post Adoption Statement

AoS Objective	Monitoring measure / indicator	Target	Data Source	Suggested frequency	Responsibility
	register as a result of development				
Objective 6: Protect and enhance the character and quality of the landscapes, townscapes and waterscapes and protect and enhance visual amenity	Change in the quality of character or status of an area designated for landscape or townscape	Reduction in direct impacts from energy infrastructure as it is developed.	National Parks and National Landscape Management Groups, Environment Agency	Annual	Natural England and relevant Local Authorities
	Changes in settings and views	Reduction in direct impacts from energy infrastructure as it is developed.	Natural England, National Parks and National Landscape Management Groups, Environment Agency and Energy Scheme developers (in respect of individual projects)	Annual	DESNZ
Objective 7: Protect and enhance the water environment	Number of water pollution incidents attributable to the	Zero	Environment Agency, Local Authorities and Energy Scheme	Annual	Energy Scheme developers and Operators (in respect of

Energy NPS Update 2025 AoS Post Adoption Statement

AoS Objective	Monitoring measure / indicator	Target	Data Source	Suggested frequency	Responsibility
	Energy Sector (across all waterbodies)		developers (in respect of individual projects)		individual projects / facilities) – reporting to DESNZ
Objective 8: Protect and enhance air quality on a local, regional, national and international scale	No exceedances of Air Quality Objectives or limit values	Zero	DEFRA / Environment Agency, Local Authorities and Energy Scheme developers and Operators (in respect of individual projects)	Annual	Energy Scheme developers and Operators (in respect of individual projects / facilities) – reporting to DESNZ
	Meet air quality emission targets	Reduce emissions consistent with aim to meet targets to Ceiling Directive	DESNZ and Energy Scheme developers and Operators (in respect of individual projects).	Annual	Energy Scheme developers and Operators (in respect of individual projects / facilities) – reporting to DESNZ
Objective 9: Protect soil resources, promote use of brownfield land and avoid land contamination	Area (in hectares) of best and most versatile land (grades 1,2 or 3a) included within or	Year-on-year reduction in the area of best and most versatile land within or	Local Authorities and Energy Scheme developers (in respect of	Annual	Energy Scheme developers and Operators (in respect of individual projects

Energy NPS Update 2025 AoS Post Adoption Statement

AoS Objective	Monitoring measure / indicator	Target	Data Source	Suggested frequency	Responsibility
	impacted by new Energy Schemes	impacted by new Energy schemes subject to loss or degraded quality.	individual projects)		/ facilities) – reporting to DESNZ
	Area (in hectares) of previously contaminated land included within or impacted by new Energy Schemes	100% of previously contaminated land covered by new Energy Schemes subject to decontamination measures	Local Authorities and Energy Scheme developers (in respect of individual projects)	Annual	Energy Scheme developers and Operators (in respect of individual projects / facilities) – reporting to DESNZ
	Area (in hectares) of brownfield land included within or impacted by new Energy Schemes	Increase in amount of brownfield land utilised by new Energy schemes	Local Authorities and Energy Scheme developers (in respect of individual projects)	Annual	Energy Scheme developers and Operators (in respect of individual projects / facilities) – reporting to DESNZ
Objective 10: Protect, enhance and promote geodiversity	Area (in hectares) of designated geodiversity sites (RIGS and / or SSSIs) included within or impacted by Energy schemes	100% of designated geodiversity sites retained at their current condition or subject to	Natural England, Local Authorities and Energy Scheme developers (in respect of	Annual (subject to data availability)	DESNZ

Energy NPS Update 2025 AoS Post Adoption Statement

AoS Objective	Monitoring measure / indicator	Target	Data Source	Suggested frequency	Responsibility
		improvement in their condition Year-on-year reduction in the % of geodiversity sites within or impacted by Energy schemes subject to loss or degraded condition.	individual projects)		
Objective 11: Improve health and well-being and safety for all citizens and reduce inequalities in health	Households living in fuel poverty	Year on year reduction in numbers living in fuel poverty	Environment Agency, Public Health bodies including those in Devolved Administrations and Agencies	Annual	DESNZ supported by relevant authorities
Objective 12: Promote sustainable transport and minimise detrimental impacts on strategic transport network and disruption to basic services and infrastructure	Proportion of new Energy Schemes with Transport Management Plans that emphasise sustainable transport modes including public and active travel	100% of new Energy schemes	Local Authorities and Energy Scheme developers (in respect of individual projects)	Annual	Energy Scheme developers and Operators (in respect of individual projects / facilities) – reporting to DESNZ

Energy NPS Update 2025 AoS Post Adoption Statement

AoS Objective	Monitoring measure / indicator	Target	Data Source	Suggested frequency	Responsibility
Objective 13: To promote a strong economy with opportunities for local communities	GVA per capita and percentage change in employment and or number of apprenticeships / training schemes in areas of proposed Energy Schemes	Increase employment and apprenticeships / training schemes	NOMIS / Office for National Statistics	Annual	DESNZ supported by relevant authorities
	Monitoring of social issues and level of social / health provision in areas of proposed energy schemes.	To inform scheme development – ensure appropriate level of provision	Local Authorities and Energy Scheme developers (in respect of individual projects)	Annual	Energy Scheme developers and Operators (in respect of individual projects / facilities) – reporting to DESNZ
Objective 14: Promote sustainable use of resources and natural assets	Proportion of construction materials used in new Energy schemes derived from alternative secondary and / or recycled sources.	100% of Energy schemes employing reuse, recovery and recycling practices during construction	Local Authorities and Energy Scheme developers (in respect of individual projects)	Annual	Energy Scheme developers and Operators (in respect of individual projects / facilities) – reporting to DESNZ
	Proportion (by mass) of waste arising associated with new	Year-on-year increase in % of waste materials	Local Authorities and Energy Scheme	Annual	Energy Scheme developers and Operators (in

Energy NPS Update 2025 AoS Post Adoption Statement

AoS Objective	Monitoring measure / indicator	Target	Data Source	Suggested frequency	Responsibility
	Energy schemes which is reused or recycled	generated during construction being reused on-site	developers (in respect of individual projects)		respect of individual projects / facilities) – reporting to DESNZ

Appendix A: Consultation comments and how these have been addressed

A large number of comments were received from a range of organisations in respect of the AoS Scoping Report. The organisations which responded to the AoS Scoping Report consultation were:

- Historic Environment Scotland
- Natural England
- Welsh Government
- Historic England
- The Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA)
- Nature Scot
- Natural Resources Wales
- JNCC
- Environment Agency
- Cadw

How the comments received from the above organisations were addressed is set out in 'Appendix B Response to Consultation' of the AoS Report and are not repeated here.

A series of comments were also received from the public consultation to the draft NPS, both in relation to the NPS itself and the AoS Report. How the comments specifically relating to the AoS were addressed is set out below (and also in the final AoS Report Appendix B).

Table A.1 – Consultation comments and how these were addressed

Organisation	Consultation comment	How this was addressed?
Historic Environment Scotland	We are content to agree with the findings of the sustainability appraisal in relation to the historic environment in Scotland.	Not applicable
Department of Agriculture, Environment and Rural Affairs (DAERA) / Northern Ireland Environment Agency	Welcome that potential for transboundary effects has been considered in AoS and HRA – specific note should be made of potential for effects in Northern Ireland, in addition to other countries outside the UK.	While the NPS applies to England and Wales and there is a focus on those countries, the AoS considers potential effects in all four countries within the United Kingdom. In addition, note is made (Chapter 9) that Ireland, France, Belgium, Germany, Denmark, Sweden and the

		Netherlands should be consulted on the potential for significant environmental effect from implementation of the NPS. It is also noted there would also be potential effects on Norway and the Crown Dependencies of the Isle of Man and the Channel Islands as well as in each of the four nations within the United Kingdom.
	Transboundary effects (including on seascapes) should be considered in respect of offshore windfarms. Consideration should also be made of biogeographic regions and connectivity with Northern Ireland and the Republic of Ireland.	The potential for transboundary effects are addressed in the AoS Report (Section 8). Note is made in Appendix D to the AoS Report that Northern Ireland defines 24 different regional seascape character areas around the coast which describe the key features and characteristics of each seascape character area. A footnote is also provided for where additional information can be found.
	Suggested additional strategies and plans should be noted as follows: Northern Ireland Marine Protected Areas (MPAs) Strategy Review 2025 Northern Ireland Blue carbon Strategy 2025 Northern Ireland seabird strategy (consultation draft) Northern Ireland elasmobranch strategy (consultation draft)	Additional strategies and plans noted and included in Appendix C to the AoS Report.

	A full list of SPAs and SACs potentially impacted in Northern Ireland should be provided	An updated note is made in Appendix D to the AoS Report that in Northern Ireland there are a total of 58 SACs (including some with a cross border element) and 16 SPAs. A footnote is also made as to where up to date information on these can be found.
Environment Agency	A range of suggestions were made regarding specific text in the NPS. No specific comment made on contents of AoS.	Comments made have been addressed as part of review / update of the NPS and any implications in relation to sustainability have been addressed.
Historic England	EN 3 uses a mixture of terminology. We strongly suggest that terminology is aligned with the relevant terms used and defined in the NPPF glossary. For example, 'Heritage Assets', 'Designated Heritage Assets' and the 'Historic Environment'. Regarding the term 'cultural heritage', we recognise that it has been used in the recently published marine plans (2021) and is also used in the UK Marine Policy Statement, 2011, which has same status as NPPF e.g. at paragraph 2.6.6.2. In both plans it is made clear that the historic environment represents a unique aspect of our understanding of what is meant by cultural heritage. We recommend that this is reflected in the NPS for clarity and consistency. This will help to deliver good outcomes for the environment as a whole. This should be expressed throughout the NPS itself where relevant and specified in the Glossary. We would be happy to provide a fuller definition if that would be helpful.	While this comment is in direct relation to the NPS, it is worth noting for clarity that the term 'cultural heritage' is used within the SEA Regulations and is taken to include architectural and archaeological heritage within those Regulations. As such the term 'cultural heritage' is widely used within the AoS Report, though it is made clear that this includes the wider historic environment, as well as setting of heritage assets and so on.
	In relation to the Appraisal of Sustainability (AoS) we recommend that the baseline information includes reference to Historic	Reference to Historic Environment Records was made in AoS

	Environment Records (HERs). HERs are information services that provide access to comprehensive and dynamic resources relating to the archaeology and historic built environment of a defined geographic area. They contain details on local archaeological sites and finds, historic buildings and historic landscapes and are regularly updated. This information is usually held in a database with a digital mapping system (Geographic Information System). There are over 80 HERs in England which are maintained and managed by local authorities as the essential core of their historic environment services. Whilst not currently a statutory duty, Section 230 of the Levelling Up and Regeneration Act makes provision for HERs to be given a statutory status and requiring local authorities to maintain HERs. We therefore consider it appropriate for the AoS to reference HERs. More details on HERs can be found at https://historicengland.org.uk/advice/technical-advice/information-management/hers/.	Appendix D, which also contained links to more information on these source of information. It is to be noted that the scale at which the NPS apply (England and Wales), does not allow for detailed information on HERs to be included in reporting / mapping. This issue relating to 'scale' is addressed in the Baseline information and key issues section (Chapter 3) of the AoS Report.
Natural England	Natural England has concerns around the feasibility of undertaking the data collection and analysis as set out in the monitoring programme in the AoS. We would welcome the opportunity to discuss realistic and measurable targets and Natural England's responsibilities on the associated reporting in further detail.	Further consideration of the points raised by Natural England resulted in amendments to the proposed monitoring – see Section 6.
	Looking at the conclusion in section 8 of the HRA, Natural England agrees with the statement that 'adverse effects on the integrity of one or more Habitats Sites as a result of the energy infrastructure development cannot be ruled out'. We also agree that new energy infrastructure development is likely to require project-level HRA.	Noted.
	Paragraphs 4.2.34 and 4.2.35 of EN-1 imply that applicants will easily pass the HRA derogations tests and provide suitable compensation measures. While the AoS	NPSs cannot take precedence over what is set out in legislation. As such, compensation

	(page 266) sets out that measures should only be derogated “as a last resort” when it can be satisfactorily demonstrated that the low carbon infrastructure could otherwise not be developed due to certain significant residual environmental impacts’,. Natural England does not consider that this position has been sufficiently emphasised in EN-1.	measures will still be a last resort for CNP infrastructure after alternative solutions and IROPI have been considered. Section 4.2.34 of EN-1 clarifies circumstances which are unlikely to be considered as alternative solutions and explains that energy security and decarbonisation of the power sector are capable of amounting to IROPI. The wording should not be taken to imply that developers will pass easily through these tests and the NPS clearly sets out the stages of derogation in Figure 2, where compensation measures are considered after IROPI has been established and alternative solutions have been explored. Further clarification has been provided in updated EN-1: ‘Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants
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		should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated. Measures that result in a significant reduction in generation capacity for CNP infrastructure are unlikely to be considered to be appropriate as mitigation. There may be exceptional circumstances where the mitigation could have a significant benefit and warrant a small reduction in generation capacity and function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the effects outweigh the marginal loss of function.'
	EN-1 sets out that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure, and that low carbon energy generating technologies are CNP infrastructure. The AoS for the NPSs (page 272) sets out that 'as the current CNP approach stops at compensation in the mitigation hierarchy, it will not rebuild nature at the same time as building the new energy infrastructure. It is recommended that CNP policy clearly states that enhancement will be required as part of any CNP compensation package'. This recommendation in the AoS is consistent with the Clean Power 2030 Action Plan, which states that "We will ensure that	Section 4.6 of EN-1 covers Environmental and Biodiversity Net Gain. It states that developers should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity and the wider environment where possible. This applies to all energy infrastructure which are

	the protection of nature is embedded into the delivery of Clean Power 2030, including by delivering the Marine Recovery Funds for Offshore Wind, and using development to fund nature recovery where currently both are stalled.” The Clean Power 2030 Action Plan also states that “The real opportunity available to the UK is to deliver clean power by 2030 in a nature positive way”. Although enhancement is referred to throughout the NPSs, Natural England does not consider that the CNP policy is explicit in its requirement for enhancement. We consider that this should be clearly stated, in accordance with the AoS recommendation and to accord with the ambitions of the Clean Power 2030 Action Plan.	covered by the energy NPSs, including infrastructure which is defined as CNP infrastructure. A new footnote in section 4.2 (CNP) of EN-1, at para 4.2.24 clarifies that ‘Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated. As set out in Section 4.6 of this NPS, developers should seek opportunities to contribute to and enhance the natural environmental by providing net gains for biodiversity, and the wider environment where possible.’
	A range of further suggestions were made regarding specific text in the NPS.	Noted – Section 4 of this Post Adoption Statement details how consultation responses have been taken into account and this sets out that many were considered minor and related to providing additional context to

		elements of the NPS, or clarification on roles and responsibilities of particular organisations, or related to amendments to text to ensure better clarity of intention and to aid understanding. The consultation process did also result in a small number of amendments to the NPS which were considered of more direct relevance to the AoS and consideration was made of these, along with further discussions with the NPS development team as to their rationale.
Natural Resources Wales	A range of suggestions were made regarding specific text in the NPS. No specific reference was made to the AoS.	Noted – as above, see Section 4 of this Post Adoption Statement as to how consultation responses were taken into account.
JNCC	JNCC is concerned about CNP policy, as it appears to the remove the ‘alternatives test’ for CNP projects, which is in contradiction to current HRA legislation.	The NPS cannot take precedence over what is set out in legislation and do not remove the ‘alternatives test’ for CNP infrastructure. Section 4.2 of EN-1 states that applicants of CNP infrastructure must continue to show how their applications meet legal and regulatory requirements. Paragraph 4.2.34 clarifies circumstances which are unlikely to be considered as

		alternative solutions and have clearly set out the stages of derogation in Figure 2, highlighting alternative solutions must be explored.
	We welcome the inclusion of compensation sites alongside protected sites in the AoS objectives and guide questions set out in Table 4-4.	Noted.
	We question whether all objectives set out in Table 4-4 can be achieved at the same time or whether some form of prioritisation/ weighting is needed to be taken into consideration?	Table 4-4 sets out the AoS Framework which is used to assess the sustainability performance of the NPS. Under SEA Regulations guidance, no prioritisation / weighting is given to any Objective.
	Although this appraisal only covers a certain subset of policies and as such sectors, we would like to highlight that the biodiversity issues and opportunities listed are not specific only to the subset of policies and sectors under review. The planning and design of all new energy developments and their associated infrastructure should aim to avoid sensitive areas, such as Marine Protected Areas and if this isn't possible, compensation/MEEB routes applied. This reliance on all sectors treating such policies equally is important.	Noted – the AoS / HRA considered those aspects of the environment potentially affected by the implementation of the updated NPS.
	We note that the assessment of Critical National Priority for low carbon infrastructure in section 7 concludes that for the natural environment there is likely to be a materially different adverse outcome through application of CNP following application of requirements in updated EN-1 and in relevant technology NPS (if applicable). This is a result of the current CNP approach stopping at compensation in the mitigation hierarchy, and	Noted.

	allowing for residual impacts. JNCC welcomes the proposal to revise the CNP policy to clearly state that enhancement will be required as part of any CNP compensation package.	
	We welcome the HRA for the Energy NPS, but note there is no assessment for protected sites of national importance such as Marine Conservation Zones (MCZs).	It is to be noted that MCZs are designated to protect nationally important habitats and species and, therefore, are not directly relevant to HRA (which examines sites designated at a European / international level). Inclusion within HRA has the potential to lead to confusion and as such these remain outside the formal HRA reporting. Rather, within both the AoS and HRA (where relevant), consideration is made of Marine Protect Areas (MPA) which includes marine components of European sites and MCZs.

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